



Circuit Court For Prince George's County

Clerk Of The Circuit Court

Courthouse

Upper Marlboro, Md. 20772-9987

MD Relay Service Voice/ TDD

1-800-735-2258

Case No.: CAL21-05595

Other Reference No.(s): .....

Child Support Enforcement Number: .....

Date issued: May 18, 2021

To: Delmarva Power & Light Company  
Serve: Corporate Creations Network, Inc.  
2 Wisconsin Circle, #700  
Chevy Chase, MD 20815

## WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 30 days after service of this summons upon you, in this Court, to the attached complaint filed by;

STEVEN E. COLLISON  
1557 GOVERNOR BRIDGE ROAD  
DAVIDSONVILLE MD 21035

This summons is effective for service only if served within 60 days after the date it is issued.

*Mahasin El Amin*  
Clerk of the Circuit Court  
#216

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued. If it is not served within the 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

## SHERIFF'S RETURN

Circuit Court for Prince George's County

To: .....

Sheriff fee: ..... By: .....

Served: .....

Time: ..... Date: .....

Unserved (Reason): .....

With the following:

- ☐ Summons
- ☐ Complaint
- ☐ Motions
- ☐ Petition and Show Cause Order

- ☐ Counter Complaint
- ☐ Domestic Case Information Report
- ☐ Financial Statement
- ☐ Other: \_\_\_\_\_  
(please specify)

Was unable to serve because:

- ☐ Moved; left no forwarding address
- ☐ Address not in Jurisdiction

- ☐ No such address
- ☐ Other: \_\_\_\_\_  
(please specify)

Sheriff Fee: \$ \_\_\_\_\_

☐ Waived by: \_\_\_\_\_

\_\_\_\_\_  
(Serving Sheriff's Signature & Date)

Instructions to Private Process:

1. This Summons is effective for service only if served within 60 days after the date issued. If it is not served within the 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Rule 2-126.
4. If this summons is served by private process, process server shall file a separate affidavit as required by Rule 2-126(a).

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

STEVEN E. COLLISON  
1557 Governor Bridge Road  
Davidsonville, MD 21035

CASE NO: *CAL 21-05595*

*Plaintiff,*

vs.

DELMARVA POWER & LIGHT COMPANY  
Mailstop 92 DC 42  
500 N. Wakefield Drive  
Newark, De 19702-5440

SERVE:  
Corporate Creations Network, Inc.  
#700  
2 Wisconsin Circle  
Chevy Chase, MD 20815

Resident Agent

and

NEIL PATRICK BAKER  
8586 Delmar Road  
Delmar, De 19940

*Defendants.*

.....

**COMPLAINT AND PRAYER FOR JURY TRIAL**

Now comes Plaintiff, STEVEN E. COLLISON, by COHEN & GREENE, P.A., his attorneys, and sues DELMARVA POWER & LIGHT COMPANY and NEIL PATRICK BAKER, and for reasons states:

1. On or about August 9, 2018, Plaintiff, Steven E. Collison was operating a motor vehicle eastbound on Rt. 50 and Defendant Neil Patrick Baker was operating a motor vehicle owned by Defendant Delmarva Power & Light Company, to Plaintiff's rear on eastbound Rt. 50 which is a public road in Prince George's County, Maryland.

CLERK OF THE  
CIRCUIT COURT  
MAY 14 PM 12:50  
PRINCE GEORGE CO MD #35

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2. That at the time and place aforesaid, Defendant Neil Patrick Baker operated his vehicle in a negligent fashion by traveling at a speed too great for traffic conditions, failing to control his vehicle to avoid colliding with Plaintiff's vehicle, failing to observe the presence of Plaintiff's vehicle lawfully stopped on the roadway forward of Defendant, failing to pay full time and attention to his driving and in other fashions to be shown at Trial.

3. As a direct and proximate result of Defendant Neil Patrick Baker's negligence, his vehicle collided with Plaintiff's vehicle, causing damage to Plaintiff. No negligence of Plaintiff contributed to this occurrence.

4. As a direct and proximate result of the Defendant Neil Patrick Baker's negligence, Plaintiff suffered severe personal injuries of both a temporary and permanent nature, suffered great bodily injury and mental anguish, and has and will experience great expense for medical care.

5. As a direct and proximate result of Defendant Neil Patrick Baker's negligence and the aforesaid injuries and damages, Plaintiff has been and will be incapacitated and prevented from pursuing his normal occupation, business and social affairs.

6. At the time of the tort alleged, Defendant Neil Patrick Baker was an employee of Defendant Delmarva Power & Light Company, and was acting within the scope of his employment.

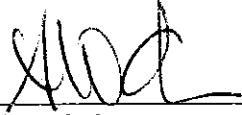
7. Defendant Delmarva Power & Light Company is vicariously liable for the negligence of Defendant Neil Patrick Baker.

8. Defendant Delmarva Power & Light Company is a Delaware Corporation doing business in Maryland.

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**WHEREFORE**, pursuant to Maryland Rule 2-305, Plaintiff demands judgment against Delmarva Power & Light Company and Neil Patrick Baker, jointly and severally, in an amount in **excess** of **SEVENTY-FIVE THOUSAND (\$75,000.00) DOLLARS**, plus costs of suit.

COHEN & GREENE, P.A.

By   
Allen W. Cohen  
156 South Street  
Annapolis, Maryland 21401  
(410) 268-4500  
[awcohen@cohenandgreene.com](mailto:awcohen@cohenandgreene.com)  
CPF I.D. #7512010055  
Attorneys for Plaintiff

**Certificate of Compliance with Maryland Rule 1-322.1**

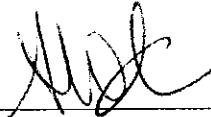
I, Allen W. Cohen, do hereby certify, pursuant to Maryland Rule 1-322.1, that the foregoing pleading does not include any individual's Social Security number, taxpayer identification number, or the alpha or numeric characters of a financial or medical account identifier.

  
Allen W. Cohen

**PRAYER FOR JURY TRIAL**

Mr. Clerk:

Please note that Plaintiff prays Trial by Jury.

  
Allen W. Cohen

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

(City or County)

**CIVIL - NON-DOMESTIC CASE INFORMATION REPORT****DIRECTIONS**

**Plaintiff:** This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

**Defendant:** You must file an Information Report as required by Rule 2-323(h).

**THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING**

|   |  |                            |
|---|--|----------------------------|
| <b>FORM FILED BY:</b> <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT                              |  | <b>CASE NUMBER</b> _____   |
| <b>CASE NAME:</b> STEVEN E. COLLISON  |  | (Clerk to insert)          |
| Plaintiff   |  | vs. DELMARVA POWER, et al  |
| Defendant   |  |                            |
| <b>PARTY'S NAME:</b> _____  |  | <b>PHONE:</b> _____        |
| <b>PARTY'S ADDRESS:</b> _____   |  |                            |
| <b>PARTY'S E-MAIL:</b> _____  |  |                            |
| <b>If represented by an attorney:</b>   |  |                            |
| <b>PARTY'S ATTORNEY'S NAME:</b> ALLEN W. COHEN  |  | <b>PHONE:</b> 410-268-4500 |
| <b>PARTY'S ATTORNEY'S ADDRESS:</b> 156 SOUTH STREET, ANNAPOLIS, MD 21401  |  |                            |
| <b>PARTY'S ATTORNEY'S E-MAIL:</b> awcohen@cohenandgreene.com  |  |                            |
| <b>JURY DEMAND?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   |  |                            |
| <b>RELATED CASE PENDING?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, Case #(s), if known: _____ |  |                            |
| <b>ANTICIPATED LENGTH OF TRIAL?:</b> _____ hours 1-2 days   |  |                            |

**PLEADING TYPE**

**New Case:** ☐ Original ☐ Administrative Appeal ☐ Appeal  
**Existing Case:** ☐ Post-Judgment ☐ Amendment

*If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.*

**IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)**

|   |  |   |  |
|---|--|---|--|
| <b>TORTS</b><br><input type="checkbox"/> Asbestos<br><input type="checkbox"/> Assault and Battery<br><input type="checkbox"/> Business and Commercial<br><input type="checkbox"/> Conspiracy<br><input type="checkbox"/> Conversion<br><input type="checkbox"/> Defamation<br><input type="checkbox"/> False Arrest/Imprisonment<br><input type="checkbox"/> Fraud<br><input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____<br><input type="checkbox"/> Loss of Consortium<br><input type="checkbox"/> Malicious Prosecution<br><input type="checkbox"/> Malpractice-Medical<br><input type="checkbox"/> Malpractice-Professional<br><input type="checkbox"/> Misrepresentation<br><input checked="" type="checkbox"/> Motor Tort<br><input type="checkbox"/> Negligence<br><input type="checkbox"/> Nuisance<br><input type="checkbox"/> Premises Liability<br><input type="checkbox"/> Product Liability<br><input type="checkbox"/> Specific Performance<br><input type="checkbox"/> Toxic Tort<br><input type="checkbox"/> Trespass<br><input type="checkbox"/> Wrongful Death<br><b>CONTRACT</b><br><input type="checkbox"/> Asbestos<br><input type="checkbox"/> Breach<br><input type="checkbox"/> Business and Commercial<br><input type="checkbox"/> Confessed Judgment<br>(Cont'd)<br><input type="checkbox"/> Construction<br><input type="checkbox"/> Debt<br><input type="checkbox"/> Fraud | <input type="checkbox"/> Government<br><input type="checkbox"/> Insurance<br><input type="checkbox"/> Product Liability<br><b>PROPERTY</b><br><input type="checkbox"/> Adverse Possession<br><input type="checkbox"/> Breach of Lease<br><input type="checkbox"/> Detinue<br><input type="checkbox"/> Distress/Distrain<br><input type="checkbox"/> Ejectment<br><input type="checkbox"/> Forcible Entry/Detainer<br><input type="checkbox"/> Foreclosure<br><input type="checkbox"/> Commercial<br><input type="checkbox"/> Residential<br><input type="checkbox"/> Currency or Vehicle<br><input type="checkbox"/> Deed of Trust<br><input type="checkbox"/> Land Installments<br><input type="checkbox"/> Lien<br><input type="checkbox"/> Mortgage<br><input type="checkbox"/> Right of Redemption<br><input type="checkbox"/> Statement Condo<br><input type="checkbox"/> Forfeiture of Property / Personal Item<br><input type="checkbox"/> Fraudulent Conveyance<br><input type="checkbox"/> Landlord-Tenant<br><input type="checkbox"/> Lis Pendens<br><input type="checkbox"/> Mechanic's Lien<br><input type="checkbox"/> Ownership<br><input type="checkbox"/> Partition/Sale in Lieu<br><input type="checkbox"/> Quiet Title<br><input type="checkbox"/> Rent Escrow<br><input type="checkbox"/> Return of Seized Property<br><input type="checkbox"/> Right of Redemption<br><input type="checkbox"/> Tenant Holding Over | <b>PUBLIC LAW</b><br><input type="checkbox"/> Attorney Grievance<br><input type="checkbox"/> Bond Forfeiture Remission<br><input type="checkbox"/> Civil Rights<br><input type="checkbox"/> County/Mncpl Code/Ord<br><input type="checkbox"/> Election Law<br><input type="checkbox"/> Eminent Domain/Condemn.<br><input type="checkbox"/> Environment<br><input type="checkbox"/> Error Coram Nobis<br><input type="checkbox"/> Habeas Corpus<br><input type="checkbox"/> Mandamus<br><input type="checkbox"/> Prisoner Rights<br><input type="checkbox"/> Public Info. Act Records<br><input type="checkbox"/> Quarantine/Isolation<br><input type="checkbox"/> Writ of Certiorari<br><b>EMPLOYMENT</b><br><input type="checkbox"/> ADA<br><input type="checkbox"/> Conspiracy<br><input type="checkbox"/> EEO/HR<br><input type="checkbox"/> FLSA<br><input type="checkbox"/> FMLA<br><input type="checkbox"/> Workers' Compensation<br><input type="checkbox"/> Wrongful Termination<br><b>INDEPENDENT PROCEEDINGS</b><br><input type="checkbox"/> Assumption of Jurisdiction<br><input type="checkbox"/> Authorized Sale<br><input type="checkbox"/> Attorney Appointment<br><input type="checkbox"/> Body Attachment Issuance<br><input type="checkbox"/> Commission Issuance | <input type="checkbox"/> Constructive Trust<br><input type="checkbox"/> Contempt<br><input type="checkbox"/> Deposition Notice<br><input type="checkbox"/> Dist Ct Mtn Appeal<br><input type="checkbox"/> Financial<br><input type="checkbox"/> Grand Jury/Petit Jury<br><input type="checkbox"/> Miscellaneous<br><input type="checkbox"/> Perpetuate Testimony/Evidence<br><input type="checkbox"/> Prod. of Documents Req.<br><input type="checkbox"/> Receivership<br><input type="checkbox"/> Sentence Transfer<br><input type="checkbox"/> Set Aside Deed<br><input type="checkbox"/> Special Adm. - Atty<br><input type="checkbox"/> Subpoena Issue/Quash<br><input type="checkbox"/> Trust Established<br><input type="checkbox"/> Trustee Substitution/Removal<br><input type="checkbox"/> Witness Appearance-Compel<br><b>PEACE ORDER</b><br><input type="checkbox"/> Peace Order<br><b>EQUITY</b><br><input type="checkbox"/> Declaratory Judgment<br><input type="checkbox"/> Equitable Relief<br><input type="checkbox"/> Injunctive Relief<br><input type="checkbox"/> Mandamus<br><b>OTHER</b><br><input type="checkbox"/> Accounting<br><input type="checkbox"/> Friendly Suit<br><input type="checkbox"/> Grantor in Possession<br><input type="checkbox"/> Maryland Insurance Administration<br><input type="checkbox"/> Miscellaneous<br><input type="checkbox"/> Specific Transaction<br><input type="checkbox"/> Structured Settlements |
|---|--|---|--|

Clerk of the Circuit Court

**IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)**

- |  |   |  |   |
|--|---|--|---|
| <input type="checkbox"/> Abatement               | <input type="checkbox"/> Earnings Withholding   | <input type="checkbox"/> Judgment-Interest           | <input type="checkbox"/> Return of Property     |
| <input type="checkbox"/> Administrative Action   | <input type="checkbox"/> Enrollment             | <input type="checkbox"/> Judgment-Summary            | <input type="checkbox"/> Sale of Property       |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement            | <input type="checkbox"/> Liability                   | <input type="checkbox"/> Specific Performance   |
| <input type="checkbox"/> Arbitration             | <input type="checkbox"/> Findings of Fact       | <input type="checkbox"/> Oral Examination            | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination     | <input type="checkbox"/> Foreclosure            | <input type="checkbox"/> Order                       | <input type="checkbox"/> Writ-Execution         |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction             | <input type="checkbox"/> Ownership of Property       | <input type="checkbox"/> Writ-Garnish Property  |
| <input type="checkbox"/> Cease & Desist Order    | <input type="checkbox"/> Judgment-Affidavit     | <input type="checkbox"/> Partition of Property       | <input type="checkbox"/> Writ-Garnish Wages     |
| <input type="checkbox"/> Condemn Bldg            | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order                 | <input type="checkbox"/> Writ-Habeas Corpus     |
| <input type="checkbox"/> Contempt                | <input type="checkbox"/> Judgment-Confessed     | <input type="checkbox"/> Possession                  | <input type="checkbox"/> Writ-Mandamus          |
| <input type="checkbox"/> Court Costs/Fees        | <input type="checkbox"/> Judgment-Consent       | <input type="checkbox"/> Production of Records       | <input type="checkbox"/> Writ-Possession        |
| <input type="checkbox"/> Damages-Compensatory    | <input type="checkbox"/> Judgment-Declaratory   | <input type="checkbox"/> Quarantine/Isolation Order  |   |
| <input type="checkbox"/> Damages-Punitive        | <input type="checkbox"/> Judgment-Default       | <input type="checkbox"/> Reinstatement of Employment |   |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

☐ Liability is conceded. ☐ Liability is not conceded, but is not seriously in dispute. ☐ Liability is seriously in dispute.

**MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)**

☐ Under \$10,000    ☐ \$10,000 - \$30,000    ☒ \$30,000 - \$100,000    ☐ Over \$100,000

☒ Medical Bills \$ 51679.14    ☐ Wage Loss \$ \_\_\_\_\_    ☐ Property Damages \$ \_\_\_\_\_

**ALTERNATIVE DISPUTE RESOLUTION INFORMATION**

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

A. Mediation    ☐ Yes    ☐ No    C. Settlement Conference    ☐ Yes    ☐ No  
B. Arbitration    ☐ Yes    ☐ No    D. Neutral Evaluation    ☐ Yes    ☐ No

**SPECIAL REQUIREMENTS**

- ☐ If a Spoken Language Interpreter is needed, **check here and attach form CC-DC-041**
- ☐ If you require an accommodation for a disability under the Americans with Disabilities Act, **check here and attach form CC-DC-049**

**ESTIMATED LENGTH OF TRIAL**

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

*(Case will be tracked accordingly)*

- ☐ 1/2 day of trial or less    ☐ 3 days of trial time  
☐ 1 day of trial time    ☐ More than 3 days of trial time  
☒ 2 days of trial time

**BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM**

*For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.*

- ☐ **Expedited**- Trial within 7 months of Defendant's response    ☐ **Standard** - Trial within 18 months of Defendant's response

**EMERGENCY RELIEF REQUESTED**

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE  
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under  
Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

- ☐ **Expedited** - Trial within 7 months of Defendant's response      ☐ **Standard** - Trial within 18 months of Defendant's response

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY,  
PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

**CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)**

- ☐ Expedited      Trial 60 to 120 days from notice. Non-jury matters.
- ☐ Civil-Short      Trial 210 days from first answer.
- ☐ Civil-Standard      Trial 360 days from first answer.
- ☐ Custom      Scheduling order entered by individual judge.
- ☐ Asbestos      Special scheduling order.
- ☐ Lead Paint      Fill in: Birth Date of youngest plaintiff .....
- ☐ Tax Sale Foreclosures      Special scheduling order.
- ☐ Mortgage Foreclosures      No scheduling order.

**CIRCUIT COURT FOR BALTIMORE COUNTY**

- ☐ Expedited  
(Trial Date-90 days)      Attachment Before Judgment, Declaratory Judgment (Simple),  
Administrative Appeals, District Court Appeals and Jury Trial Prayers,  
Guardianship, Injunction, Mandamus.
- ☐ Standard  
(Trial Date-240 days)      Condemnation, Confessed Judgments (Vacated), Contract, Employment  
Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort,  
Other Personal Injury, Workers' Compensation Cases.
- ☐ Extended Standard  
(Trial Date-345 days)      Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or  
Personal Injury Cases (medical expenses and wage loss of \$100,000, expert  
and out-of-state witnesses (parties), and trial of five or more days), State  
Insolvency.
- ☐ Complex  
(Trial Date-450 days)      Class Actions, Designated Toxic Tort, Major Construction Contracts, Major  
Product Liabilities, Other Complex Cases.

May 10, 2021

Date

156 SOUTH STREET

Address

ANNAPOLIS

City

MD

State

21401

Zip Code

Signature of Counsel / Party

ALLEN W. COHEN

Printed Name